

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

ROBERT H. KELLY AND WIFE,  
MARY KELLY

VS.

D. B. INDUSTRIES, INC.

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CIVIL ACTION NO.4:07-cv-2671  
JUDGE MELINDA HARMON

**DESIGNATION OF EXPERTS OF PLAINTIFFS**

COME NOW, **Robert H. Kelly and wife, Mary Kelly**, Plaintiffs herein, and file this  
their Designation of Expert Witnesses as follows, to-wit:

I.

The following will give expert testimony at the trial of this matter:

Dr. Grant Dona  
411 E. Vaughn Ave, #201  
Ruston, LA  
318-323-8451

Physicians at the  
Citizens Medical Center  
P.O. Box 1079  
Columbia, LA 71418  
318-649-6106

David Williams, Ph.D.  
Psychology Clinic  
1401 Royal Avenue  
Monroe, Louisiana 71201

Vincent Forte, M.D.  
Louisiana Pain Care, LLC  
210 Layton Avenue, Suite #20  
Monroe, Louisiana 71201

Mr. Beryl Gamse  
McDowell Owens  
1075 Kingwood Drive, #100  
Kingwood, Texas 77339  
281-358-2876

Maunsell Wilkinson  
Rehabilitation Services Associates, Inc.  
4655 Collier  
Beaumont, Texas 77706  
409-833-5263

II.

Plaintiffs reserve the right to elicit expert testimony, by way of direct, cross-examination or rebuttal, from any of Defendant's experts.

III.

Plaintiffs reserve the right to call rebuttal witnesses to refute the testimony of any and all expert witnesses called by Defendant.

IV.

Plaintiffs reserve the right to amend or supplement this Designation of Expert Witnesses.

Respectfully submitted,

**STEVEN C. BARKLEY**

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/s/ Steven C. Barkley

**STEVEN C. BARKLEY**

STATE BAR NO. 01750500

FEDERAL ID NO. 4947

ATTORNEY FOR PLAINTIFFS,  
ROBERT KELLY AND WIFE,  
MARY KELLY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to the following counsel of record, via electronic filing, on this the 5th day of September, 2008:

Mr. Matthew W. Childs  
Tekell Book Matthews & Limmer, LLP  
4300 One Houston Center  
1221 McKinney  
Houston, Texas 77010  
**Attorney for Defendant, D. B. Industries, Inc.**

Mr. Kelly Hartmann  
Galloway Johnson Tompkins Burr & Smith  
1301 McKinney, Suite 1400  
Houston, Texas 77010  
**Attorney for Intervenor, Zurich North America**

/s/ Steven C. Barkley  
**STEVEN C. BARKLEY**